

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS, and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

CIVIL ACTION NO. 2:23-CV-00352

JURY TRIAL DEMANDED

DEFENDANTS' UNOPPOSED MOTION TO FILE UNDER SEAL

Pursuant to Eastern District of Texas Local Rule 5(a)(7)(C), Defendants and Counterclaim-Plaintiffs Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) move to file Verizon’s Answer under seal.

There is good cause for this document to be filed under seal. There is currently no Protective Order entered in this matter, and the Answer contains highly sensitive information relating to the terms of a licensing and development agreement between the parties. Accordingly, to preserve the confidentiality of that information, Verizon respectfully requests that the Answer be filed under seal.

DATED: October 10, 2023

GIBSON, DUNN & CRUTCHER LLP

/s/ Katherine Q. Dominguez

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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF CONFERENCE

On October 10, 2023, counsel for Verizon conferred with counsel for Plaintiff Headwater Research LLC. Counsel for Plaintiff Headwater Research LLC indicated that it does not oppose this motion.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez